

should be granted because this case fails to pass muster under *Morrison* and that Dodd-Frank does not override *Morrison*.

Revealingly, while seeking to hamstring Corporate Defendants, the Commission then asks for ***three weeks*** to respond to Corporate Defendants' brief. That the SEC feels it needs this extended response period in and of itself: (a) belies the SEC's groundless claim that the Corporate Defendants' motion is "frivolous";¹ and (b) demonstrates the merit in the Corporate Defendants' request for a full and fair briefing schedule.

Given that this is such an important issue in this case and otherwise, there is no reason whatsoever for the Court to accede to the SEC's effort to rush an issue of first impression in this significant area. We urge the Court to grant our request for a full and fair briefing schedule.

Respectfully submitted,

A CHICAGO CONVENTION CENTER,
LLC, ANSHOO SETHI, and
INTERCONTINENTAL REGIONAL
CENTER TRUST OF CHICAGO, LLC

Dated: May 1, 2013

/s/ Scott Mendeloff

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¹ Corporate Defendants have found no published opinion – nor does the SEC cite one -- that holds that Dodd-Frank overrides *Morrison*, and a number of academic commentators – e.g., HARVARD BUSINESS LAW REVIEW – demonstrate that Dodd-Frank did not override *Morrison*.

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that on May 1, 2013, he electronically filed the foregoing ***DEFENDANTS A CHICAGO CONVENTION CENTER, LLC AND INTERCONTINENTAL REGIONAL CENTER TRUST OF CHICAGO, LLC'S RESPONSE TO THE SEC'S EFFORT TO AVOID A BRIEFING SCHEDULE ON DEFENDANTS' MOTION TO DISMISS*** with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all parties of record.

/s/ Scott Mendeloff